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Counsel for Plaintiff and the putative class

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

MARILYN JENSEN, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiff

vs.

HIGHLEVEL LLC,

Defendant.

Case No. 6:21-cv-00767-MC

JOINT STATUS REPORT AND
PROPOSED CASE MANAGEMENT
SCHEDULE

Plaintiff Marilyn Jensen and Defendant Highlevel LLC submit the below joint Rule 26(f) report following the telephone conference of counsel on July 21, 2021, and subsequent email correspondence:

1. Discovery Plan:

A. Initial Disclosures:

The parties do not believe that any changes should be made in the form or disclosure requirements. The parties will exchange initial disclosures on or by August 20, 2021.

B. Completion of Discovery, and Phasing of Discovery:

The parties anticipate taking discovery on the claims and defenses raised in the pleadings, and any expert discovery as necessary. The parties do not anticipate the need to phase or otherwise limit discovery.

Due to the complexity of this case, including the anticipated need for third party discovery, and anticipating that if granted additional time and discovery may be needed after a ruling on Plaintiff's motion for class certification, the parties propose the case management schedule set forth below.

C. Disclosure, Discovery, or Preservation of Electronically Stored Information:

The parties do not anticipate any issues regarding disclosure, discovery, or preservation of electronically stored information. The parties have agreed to production of native .csv files and agree to further discuss ESI protocols as needed.

D. Claims of Privilege or of Protection as Trial Preparation Materials: The parties do not anticipate any issues regarding claims of privilege or work product protection. The parties have not yet reached agreement on a procedure to assert claims of privilege or work product after production but will continue to discuss this issue as discovery proceeds.

E. Limitations of Discovery: The parties do not believe, at this time, that any changes should be made in the limitations on discovery imposed under the Federal Rules or Local Rules.

F. Other Rule 16(b), 16(c), or 26(c) Orders: The Parties anticipate that they will require a Protective Order to limit the dissemination of confidential, proprietary and/or trade secret materials in this litigation. The Parties agree to work in good faith to submit a proposed Protective

Order for entry by the Court before discovery is exchanged.

2. Proposed Case Management Schedule:

As discussed above, for good cause, the parties propose the following schedule:

EVENT	PROPOSED DEADLINE
Joinder of any additional parties	December 18, 2021
Joint ADR report	January 14, 2021
Motion for Class Certification shall be filed by	February 21, 2022
Response to Motion for Class Certification shall be filed by	March 18, 2022
Reply to Motion for Class Certification	April 8, 2022
Plaintiff(s) shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2)	May 1, 2022
Defendant(s) shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2)	May 1, 2022
Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2)	May 22, 2022
Fact discovery shall be completed	August 12, 2022
Expert discovery shall be completed	August 12, 2022
Dispositive motions, including summary judgment and Daubert, shall be filed by	September 9, 2022*
Deposition designations and counter designations shall be filed by	TBD pending resolution of dispositive motions
All pretrial motions and memoranda of law, including motions in limine, shall be filed by	TBD pending resolution of dispositive motions
Joint pretrial stipulation, deposition designations and counter-designations, proposed joint jury instructions, proposed joint verdict form, and/or proposed findings of fact and conclusions of law shall be filed by	TBD pending resolution of dispositive motions
Trial scheduled for two-week period beginning	TBD pending resolution of dispositive motions

*The parties are free to file dispositive motions before this date.

Respectfully Submitted,

Dated: August 3, 2021

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